

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

JUNE 11 2015
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA, **CR15-196 JCC**
Plaintiff,)
v.)
INDICTMENT
VICTOR LARRY LEE WRIGHT,)
Defendant.)
_____)

The Grand Jury charges that:

COUNT 1

(Production of Child Pornography)

On a date unknown, but no later than May 14, 2015, at Federal Way, within the Western District of Washington, and elsewhere, VICTOR LARRY LEE WRIGHT did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate

1 and foreign commerce by any means, including by computer, and the visual depiction
2 was transported using any means and facility of interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

4 **COUNT 2**

5 **(Distribution of Child Pornography)**

6 On or about April 6, 2015, at Federal Way, within the Western District of
7 Washington, and elsewhere, VICTOR LARRY LEE WRIGHT did knowingly distribute,
8 and attempt to distribute, visual depictions the production of which involved the use of
9 minors engaging in sexually explicit conduct, and the visual depictions were of such
10 conduct, using any means and facility of interstate and foreign commerce and which
11 images had been mailed and shipped and transported in and affecting interstate and
12 foreign commerce by any means, including by computer.

13 All in violation of Title 18, United States Code, Sections 2252(a)(2) and
14 2252(b)(1).

15 **COUNT 3**

16 **(Possession of Child Pornography)**

17 Beginning on a date unknown, and continuing until on or about May 14, 2015, at
18 Federal Way, within the Western District of Washington, VICTOR LARRY LEE
19 WRIGHT did knowingly possess matter that contained visual depictions the production
20 of which involved the use of minors engaging in sexually explicit conduct, and the visual
21 depictions were of such conduct, that had been mailed and shipped and transported using
22 any means or facility of interstate or foreign commerce and in and affecting interstate and
23 foreign commerce, and which had been produced using materials that had been mailed
24 and shipped and transported in and affecting interstate and foreign commerce by any
25 means, including by computer, and the images of child pornography involved include
26 images of a prepubescent minor and a minor who had not attained 12 years of age.

27 All in violation of Title 18, United States Code, Sections 2252(a)(4) and
28 2252(b)(2).

ASSET FORFEITURE ALLEGATION

Upon conviction of the offenses alleged in Counts 1 through 3 of this Indictment, VICTOR LARRY LEE WRIGHT shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, or any property traceable to such property, and any and all visual depictions as described in Title 18, United States Code, Sections 2251, 2252, and 2252A, which were produced, transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United States Code, including but not limited to:

- a. Any and all images of child pornography, in whatever format and however stored;
- b. One Dell desktop computer;
- c. HP Laptop;
- d. Seagate external hard drive;

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1 e. One Verizon tablet.
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A TRUE BILL:

4 DATED: 6-11-15
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6 *Signature of foreperson redacted*
7 *pursuant to the policy of the Judicial*
8 *Conference of the United States*

9 _____
10 FOREPERSON

11 
12 ANNETTE L. HAYES
13 United States Attorney

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15 MICHAEL DION
16 Assistant United States Attorney

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18 S. KATE VAUGHAN
19 Assistant United States Attorney
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